

JUDD BURSTEIN, P.C.
ATTORNEYS AT LAW

JUDD BURSTEIN*
JBURSTEIN@BURLAW.COM

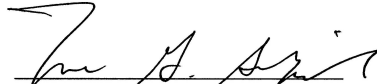
PETER B. SCHALK**
PSCHALK@BURLAW.COM

EMILY C. FINESTONE***
EFINESTONE@BURLAW.COM

*ALSO ADMITTED IN CONNECTICUT
**ALSO ADMITTED IN NEW JERSEY
***ALSO ADMITTED IN MASSACHUSETTS,
PENNSYLVANIA, AND VIRGINIA

Application GRANTED. The parties shall complete
expert discovery by the dates proposed below.

Dated: September 19, 2022
New York, New York


LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

260 MADISON AVENUE
15TH FLOOR
NEW YORK, NEW YORK 10016
TEL: (212) 974-2400
FAX: (212) 974-2944
WWW.BURLAW.COM

12 OLD HILL FARMS ROAD
WESTPORT, CONNECTICUT 06880

September 16, 2022

VIA ECF

Honorable Lorna G. Schofield
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Planck LLC, d/b/a, Patch Media v. Particle Media, Inc., d/b/a, News
Break, et al.*, Case No. 20-cv-10959 (LGS)

Dear Judge Schofield:

We write to request a slight modification of the expert discovery schedule, which will not impact the November 7, 2022 expert discovery deadline that the Court entered on August 30th (*see* Doc. No. 109). This is the first such request.

On August 31, 2022, the Court endorsed the parties' proposed expert discovery schedule, which proposed that opening reports would be due on September 26th, rebuttal reports would be due on October 24th, and depositions would be completed by November 7th (Doc. No. 110).

We have since realized that we inadvertently proposed an opening reports deadline that falls on Rosh Hashanah. To accommodate observation of the Holiday, which lasts until September 27th, we respectfully request that the Court extend the opening reports deadline until September 28th and the rebuttal reports deadline until October 26th. The expert discovery deadline and depositions deadline will remain the same.

/s/ Judd Burstein

Judd Burstein
JUDD BURSTEIN, P.C.
Attorneys for Plaintiff

/s/ Kelly M. Klaus

Kelly M. Klaus
MUNGER, TOLLES & OLSON LLP
Attorneys for Defendants